

LAURA R. SAUERBECK, RN MARCH 13, 2003

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BSA

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(1) A. Yes.

(2) Q. And did you note whether there was any missing information with respect to the interview?

(5) A. I indicated yes, interview completed with little, and again less than one-tenth or no missing information.

(8) Q. Nurse Sauerbeck, once these questionnaires were completed, you had completed your interview of he Mrs. Silvey and completed the interview of Mr. Silvey, what would be the process or the protocol for sending on the questionnaire forms, what would you do with these?

(14) A. I can't remember the exact details, I think we batched them periodically and sent them on to Yale University for editing and data entry.

(17) Q. At that point in time would you have had any further involvement or contact with either Mrs. Silvey or Mr. Silvey?

(20) A. In the context of this study, no.

(21) Q. In the context of this study. Did you have any contact with them in any other context?

(24) A. Yes.

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(1) Q. Okay. And what was the nature of that?

(3) MR. ATKINS: Let's go off the record.

(5) MR. TUCKER: We're off the record.

(6) THE VIDEOGRAPHER: Just a moment, we are off the record at 3:18.

(8) (Off the record.)

(9) THE VIDEOGRAPHER: We are on the record at 3:19.

(11) BY MR. TUCKER:

(12) Q. Yes.

(13) A. In the context of another study they were involved in, I did have contact in a three and a six-month period.

(16) Q. And that also entailed a study on strokes?

(18) A. Yes.

(19) MS. ABARAY: I'm going to enter on objection. The Court ordered that this deposition was to be limited to the Yale study.

(22) MR. TUCKER: I'm not going to inquire about the other study. I was just asking if she had any further contact.

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(1) MS. ABARAY: Okay.

(2) BY MR. TUCKER:

(3) Q. Ms. Sauerbeck, there is in front of you an exhibit we've also marked for purposes of this deposition as Exhibit 3. Can you take a look at that for me, please.

(7) MS. ABARAY: I'm sorry, I didn't get a copy of Exhibit 3.

(9) MR. TUCKER: I'm sorry.

(10) MS. ABARAY: Thank you.

(11) BY MR. TUCKER:

(12) Q. Okay. For purposes of the record, what is the date of that letter?

(14) A. November 1st, 2000.

(15) Q. And am I right to understand that that is your -- you're one of the two people that signed the letter?

(18) A. Correct.

(19) Q. The other person was Dr. Joseph Broderick as the principal investigator for the hemorrhagic stroke study?

(22) A. Correct.

(23) Q. This letter is addressed to whom, Nurse Sauerbeck?

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(1) A. Pamela Silvey.

(2) Q. Would you and Dr. Broderick have authored this letter together, is that why you both signed it?

(5) A. I don't remember who authored it truthfully.

(7) Q. Okay. But you signed it as one of the hemorrhagic stroke study study coordinators; is that right?

(10) A. Correct.

(11) Q. Am I right to understand, Mrs. Sauerbeck, that the purpose of this letter was in part to update patients on the preliminary results of the hemorrhagic stroke study that had been carried out in the Greater Cincinnati area as well as in the hospitals elsewhere around the country?

(18) A. Yes.

(19) Q. And you go on to say what the primary purpose of the study was. Would you read that into the record for us, please, what the primary study of the study was.

(23) A. This states that "The primary purpose of this study was to evaluate whether the